

AFFIDAVIT OF SPECIAL AGENT THOMAS F. KING

I, Thomas F. King, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am submitting this affidavit in support of the government's motion that the following individuals be detained pending trial: JOUSEPH CARABALLO, a/k/a "King Massa," JUAN SERRANO, a/k/a "King Poppy," TERRILL McKISSACK, a/k/a "Ralphy," RAPHAEL PINEDA, a/k/a "Raffy," GABRIEL VAZQUEZ, EZEQUIEL QUINONES, a/k/a "Flex," JAVIER NATAL, a/k/a "Lito," LUIS GUERRA, a/k/a "Ant," GIOVANNI VALE-VALEINTIN, a/k/a "Gio," MANUEL TORRES, JESUS CARRASQUILLO, PEDRO FIGUEROA, RAMON SANCHEZ, JORDAN JORGE, FELICIA TIMOTEO, ENOE CARRASQUILLO, JESMEIL ORTIZ, and MARI GOMEZ (hereinafter referred to as "the Targets"). All of the Targets were charged with various drug distribution offenses on June 7, 2012. Each of the individuals listed above are alleged to be leaders, members, significant criminal associates, or drug suppliers to the Latin Kings street gang operating in New Bedford, Massachusetts.

2. I have been employed by the FBI for over fifteen years. Prior to joining the FBI, I was a police officer for the Worcester, Massachusetts Police Department for nine years, achieving the rank of Detective Sergeant. For the past six years, I have been assigned to the FBI's Southeastern

Massachusetts Gang Task Force (hereinafter the "Task Force").

The Task Force is comprised of agents, officers and deputies from the FBI, the Massachusetts State Police, the New Bedford Police Department, the Massachusetts Parole Board, and the Bristol County Sheriff's Department. The mission of the Task Force is to identify, investigate, disrupt, and dismantle violent gangs operating in southeastern Massachusetts.

3. This is the second time in six years that the FBI Task Force has conducted an investigation into the Latin Kings in New Bedford. In 2006, the Task Force, working in conjunction with the New Bedford Police Department, identified the Latin Kings as the gang responsible for significant amounts of drug trafficking and gun violence in New Bedford.¹ After a year-long investigation, the United States Attorney's Office charged fifteen Latin King gang members or associates with drug trafficking offenses. Twenty-two other Latin Kings were

¹ Including this case, the Task Force has conducted four long-term, multi-defendant investigations in New Bedford in the past six years. In addition to the two Latin Kings investigations discussed above, the Task Force spent two and a half years conducted a lengthy investigation of two violent, warring New Bedford street gangs: United Front and Montes Park. The Task Force targeted these gangs because they had a well-documented history of committing murders and other acts of violence and retaliatory violence against each other. By 2009, at the end of the Task Force's investigation, a total of 24 members of both gangs were charged in federal court with various drug and firearm offenses. Those areas of New Bedford formerly controlled by the Montes Park and United Front gangs remain -- relatively speaking -- quiet.

prosecuted in state court by the Bristol County District Attorney's Office. The detention affidavit filed in the first FBI investigation, attached hereto, and incorporated by reference herein, as Exhibit 1, described how members of the Latin Kings used violence to control the lucrative crack cocaine market in the north end of New Bedford, the area of the city most closely associated with the gang.

4. Based on the affidavit filed in the first Latin King case, detention affidavits filed in other federal Latin King-related investigations in the District of Massachusetts, information concerning the Latin Kings submitted in other courts across the United States and, most importantly, my own participation in this investigation and the 2007 investigation,²

² In the course of developing intelligence about the Latin Kings, agents participating in this investigation have spoken to confidential informants and cooperating witnesses regarding the gang and its operations. These individuals include current or former members of the Latin Kings who were personally familiar with the gang, its operations, and its leaders. The information about the Latin Kings and its operations provided herein represents a summary of information provided by these individuals, by various cooperating witnesses, and information obtained from other sources. The information provided by individual informants has been corroborated by comparing it to information given by other cooperators, information learned by reviewing consensually recorded telephone calls from area correctional facilities where Latin King members are incarcerated, letters intercepted or confiscated from area correctional facilities where Latin King gang members are incarcerated, and from other sources, including postings by some of the Targets on public social media sites like Facebook and consensually recorded conversations that took place over the course of the investigation.

I know that the Latin Kings are a violent street gang with thousands of members across the United States and overseas. The traditional power centers for the Latin Kings are located in the Chicago and New York metropolitan areas. The Latin Kings have a detailed organizational structure, which is outlined - along with various "prayers," codes of behavior, and rituals - in a written "manifesto" widely distributed to members throughout the country, including Massachusetts.

5. Members of the Latin Kings often greet each other, and show their membership in the gang, using a set of hand signs intended to evoke the shape of a crown. In addition, Latin Kings often greet each other, demonstrate their allegiance to the gang, or simply announce their presence, by exclaiming "ADR" or "Amor De Rey," which means "King's Love" in Spanish. Members of the Latin Kings often demonstrate their affiliation with the gang by wearing clothing with black and gold, colors associated with the gang, or wearing clothing incorporating some of the gang's symbols, such as a five pointed crown.

6. The Kings operate local chapters throughout Massachusetts, including New Bedford, Springfield, Holyoke, Worcester, Lawrence, Lowell, and Chelsea, among others. The Latin Kings also operate chapters inside many correctional facilities. Much of the revenue used to operate the Latin Kings flows from the illegal activities of its members. Gang members

traffic in illegal drugs and are expected to remit a portion of their drug proceeds to the local leadership. The atmosphere of interdependence that pervades the Latin Kings also results in the use of violence to protect the illegal activities of gang members. Unwanted competition from other drug traffickers, turf threats from rival gangs, or any conduct that is perceived to be disrespectful to the Latin Kings or its members, often results in organized violence or shootings by the Latin Kings. According to the New Bedford Police Department, street level drug sales are largely controlled by the Latin Kings in the area of Tallman Street, Ashley Boulevard, North Front Street, and Bullard Street. That area is also a source of repeated calls for service (essentially, a request for police assistance), shots fired calls, shootings, assaults, and murders, as the Latin Kings seek to preserve their drug turf through violence and become targets of retaliatory violence.

II. THE REORGANIZATION OF THE LATIN KINGS IN NEW BEDFORD

7. The 2006 investigation significantly disrupted the Latin Kings in New Bedford and the north end of the city was quiet for several years. Beginning in 2010, law enforcement officials noted a significant increase in drug sales and violence in the north end and also received information that the Kings were reorganizing in earnest. On June 27, 2010, the Task Force conducted surveillance of a Latin King gang meeting at 239 Ashley

Boulevard, an apartment complex where several Latin Kings lived. Agents observed 20-25 Latin King gang members enter the building and received reliable information that three New York-area Latin Kings attended the meeting. Agents received information that the New Bedford chapter was attempting to be "blessed" by New York and officially become a part of that chapter.

8. On October 30, 2010, RICARDO ENCARNACION, a/k/a "Ricky," a prominent member of the Latin Kings, was shot and killed early in the morning in front of his home on North Front Street in New Bedford's north end. Several hours after the murder, officers from the New Bedford Police Department's Gang Unit photographed dozens of Latin Kings at the scene of the murder. At least two of the Targets, **JOUSEPH CARABALLO, a/k/a "King Massa,"** and **EZEQUIEL QUINONES, a/k/a "Flex,"** were present during the gang's impromptu display of strength. Many of the assembled Latin Kings dressed in black and gold and were photographed throwing Latin King gang signs. **CARABALLO** was photographed taking a picture of the assembled Latin Kings as the group posed for a picture. Latin King gang members constructed a street memorial for ENCARNACION at the scene of the murder which remained in place for several months. They also gathered at the murder scene at the five-month anniversary of ENCARNACION's murder (as there are five points in the Latin King crown, the fifth month carries special significance for the gang).

9. A few days after ENCARNACION's murder, agents photographed dozens of Latin King gang members at ENCARNACION's wake in Springfield, Massachusetts. The Task Force photographed many known Latin Kings from New Bedford as well as Latin Kings from the Springfield and New Haven, Connecticut, chapters of the gang. Agents photographed the following Targets at the wake: **TERRILL McKISSACK**, wearing a black hoodie with a five-pointed crown on the sweatshirt; **GABRIEL VAZQUEZ**, wearing a black and gold New Orleans Saints hat and yellow and black beads; and **JOUSEPH CARABALLO**, a/k/a "King Massa," who wore a black and gold shirt, jacket and hat.

10. In addition to the significant upswing in drug trafficking and violence in the north end of New Bedford, law enforcement officials also learned of instances where the gang attempted to use intimidation to achieve its objectives. For instance, on March 17, 2012, JOSE CARRION, a/k/a "King Nony," a self-admitted Latin King, stabbed Melvin Pina to death in New Bedford (his case is still pending). After Pina's death, Detectives executed a search warrant on CARRION's cellular telephone. On the phone, agents found photographs of the first page of the grand jury testimony of EDWIN JORGE, a Latin King gang member, who was testifying against a fellow gang member in another murder case, COMMONWEALTH v. SETH ANDRADE. The photographs did not contain EDWIN JORGE's entire grand jury

transcript but captured enough detail so that a reader would know that EDWIN JORGE had testified. JORGE testified before a state grand jury that ANDRADE had admitted committing the 2010 murder of Arthur Burton in New Bedford.

11. During the ANDRADE murder trial, prosecutors announced that EDWIN JORGE would testify on March 29, 2012. On March 29th, several gang members, including two Latin Kings -- **TERRILL McKISSACK**, one of the Targets of this investigation, and TYRONE SOLANO, a Latin King who has been convicted of being an accessory after the fact for the Arthur Burton murder³ - appeared at the ANDRADE trial for the first time. Upon seeing the gang members in the courtroom, EDWIN JORGE stated he was afraid to testify and refused to do so. The next day, Bristol County prosecutors moved to bar members of the Latin Kings (and other gang members) from the courtroom, arguing that **McKISSACK**, SOLANO, and the other gang members had been present solely to intimidate EDWIN JORGE. The prosecution also made the judge aware that photographs of EDWIN JORGE's grand jury testimony had been disseminated to another Latin King gang member (who was himself charged with murder) several weeks before his trial testimony.

12. After an evidentiary hearing, Superior Court Judge

³ SOLANO had been convicted of being an accessory after the fact. He received a short house of correction sentence which he had completed serving at the time of ANDRADE's trial.

Barbara Dorch-Okara ordered **McKISSACK**, SOLANO, and several other gang members out of the courtroom. According to the Court transcript, Judge Dorch-Okara found as follows:

The Court is of the opinion that these individuals pose a risk to the security of the court, in particular to Mr. Jorge . . . it appears that these gentlemen were here present in the court yesterday on a date in which the Court and public were advised that Edwin Jorge was scheduled to testify. It does not appear that all of these gentlemen were here on previous dates of the trial. It appears based on the testimony that various gangs are represented in these individuals. They're not all of one affiliation, and it appears that they are not here solely to support the defendant . . .

During the hearing on the prosecution's motion to limit access to the courtroom, **McKISSACK** remained outside the courtroom but sent his girlfriend into the courtroom to monitor the proceedings. After one of the homicide detectives identified her as **McKISSACK's** girlfriend, she too was excluded from court.

13. ANDRADE was convicted of first degree murder. SOLANO was charged by Bristol County prosecutors with dissemination of EDWIN JORGE's grand jury minutes to JOSE CARRION, a/k/a "King Nony" (SOLANO had received the grand jury minutes for the ANDRADE trial as part of pre-trial discovery in his own accessory after the fact to murder case). That case is pending. On May 20, 2012, SOLANO was shot and stabbed repeatedly in the south end section of New Bedford. He has to date refused to identify his assailants to law enforcement.

III. THE TARGETS

14. Given the increase in drug trafficking and violence in the North End and the intelligence developed concerning the violence associated with the Latin Kings, the Task Force began directing cooperating witnesses to make controlled purchases of drugs from leaders, members and significant associates of the Latin Kings in New Bedford. The FBI's investigation targeted those individuals who are members of the Latin Kings gang members or closely associated with the gang, such as drug suppliers to the gang. Utilizing cooperating witnesses and undercover police officers, the Task Force has spent the past eighteen months purchasing crack cocaine and heroin from the Targets.

15. The following is a list of Targets together with a brief synopsis of their connection to the Latin Kings and other information relevant to detention. Information set forth below comes from sources I consider to be reliable including, among other things, what the Targets did and said over the course of the investigation.

A. JOUSEPH CARABALLO, a/k/a "King Massa."

16. During the investigation, the Task Force identified **CARABALLO** as a senior member of the Latin Kings. Agents received information that **CARABALLO** had come to New Bedford from New Jersey in order to help reorganize the New Bedford chapter of the Latin Kings. On October 30, 2010, agents photographed **CARABALLO**

on October 30, 2010 as **CARABALLO** photographed dozens of Latin King gang members at the scene of RICARDO ENCARNACION's murder. They also photographed **CARABALLO** in Springfield as he arrived at ENCARNACION's wake wearing black and gold clothes and a black and gold hat. On March 30, 2011, **CARABALLO** and other Latin Kings were observed at a street memorial for ENCARNACION on the five-month anniversary of his murder (the fifth month signifies the five points on the Latin King crown). **CARABALLO** has an "LK" tattoo on his abdomen and on his face. Law enforcement agencies in New Jersey list **CARABALLO** as a member of the Latin Kings with the notation: "criminal gang member -- caution."

17. On January 4, 2011, **CARABALLO** sold crack cocaine to an undercover police officer. On June 8, 2011, **CARABALLO** and his wife, SINTIA NATAL, while pushing a small child in a stroller, sold heroin to an FBI CW. On May 5, 2011, an FBI CW had made arrangements to purchase crack cocaine from **JAVIER NATAL, a/k/a "Lito,"** another federal Target. When the CW arrived on Tallman Street, in the heart of Latin King territory, the CW bumped into **CARABALLO**. **CARABALLO** asked the CW what he was looking for. The CW said it was looking for "Lito" and said, "I told him I was coming up. I need to get it from him." **CARABALLO** told the CW to buy from **CARABALLO** instead and assured CW-1, "It's the same thing." **CARABALLO** started to walk away, but then came back:

Caraballo: Lito?

CW-1: Yeah. Little kid. He told me he'd be here.

Caraballo: We're brothers. Call him. Tell him it's Massa.

When CW-1 told **CARABALLO** that the phone number it had for **NATAL** was not working, **CARABALLO** called **NATAL** on **CARABALLO's** cell phone. When the CW told **CARABALLO** it would wait for **NATAL**, **CARABALLO** told the CW, "I was gonna get you five" (i.e., five rocks), then left. As **CARABALLO** walked away, the CW asked, "What's your name?", and **CARABALLO** replied, "Massa." According to information received from the Massachusetts Department of Correction, **CARABALLO's** street name, "Massa," is short for "Massacre."

18. **CARABALLO** has a conviction from the New Bedford District Court for assault with a dangerous weapon. He also has an extensive criminal history in New Jersey, including three convictions for burglary and a conviction for resisting arrest.

B. JUAN SERRANO, a/k/a "King Poppy."

19. **SERRANO** has been identified as a Latin King by the New Bedford Police Gang Unit. In 2007, he was prosecuted in federal court in the first FBI Latin Kings case for selling crack cocaine to an FBI CW. On November 3, 2011, while still on supervised release from his federal conviction, **SERRANO** sold heroin to an FBI CW on Bullard Street, in the heart of Latin King territory.

SERRANO also has a 2010 conviction for distribution of crack cocaine.

C. TERRILL McKISSACK, a/k/a "Ralphy."

20. **TERRILL McKISSACK** has been identified by the New Bedford Police Department Gang Unit as a prominent member of the Latin Kings. As noted above, he was photographed at the ENCARNACION wake and funeral wearing a black hoodie with a yellow crown and was also seen by agents at the street memorial for ENCARNACION with several other Kings on the five-month anniversary of his murder. **McKISSACK** was present in state court with another Latin King for the attempted intimidation of EDWIN JORGE during the ANDRADE murder trial.

21. In 2008, **McKISSACK** was convicted of assault and battery with a dangerous weapon (pipe and shod foot) and intimidation of a witness. According to police reports, officers responded to a shooting and spoke with a witness to the shooting, made an arrest, and recovered the firearm. The witness was named in the police report. After that case was charged, the witness was confronted by a man who asked if he was the one who "snitched." A group of four to eight men - including **McKISSACK**, wielding a metal pipe - then beat the witness. The witness was taken to a local hospital and then transferred to Brigham and Women's Hospital in Boston for treatment. When he was released, he identified **McKISSACK** from a photo array as the man who had beat

him with a pipe. **McKISSACK** was sentenced to three years in state prison for assault and battery with a dangerous weapon and was placed on probation for intimidation of a witness. **McKISSACK** was on probation for this offense when, on April 21, 2011, he sold crack to the CW.

22. **McKISSACK** also has two convictions for larceny: one from 2006 in Bristol Superior Court, after which he ultimately served six months in prison as a result of a probation violation; and a second from 2005 in New Bedford District Court to which, again as a result of a probation violation, he served a year in prison. **McKISSACK** also received a continuation without a finding in 2006 for conspiracy to violate the controlled substances act.

D. **RAPHAEL PINEDA, a/k/a "Raffy."**

23. **PINEDA** has been identified by the New Bedford Police Department Gang Unit as a member of the Latin Kings. **PINEDA** was one of the targets charged in state court as part of the 2007 Latin Kings case and pled guilty to distributing cocaine. In 2006, **PINEDA** received a supervised continuation without a finding for two counts of distributing cocaine. On September 12, 2011, **PINEDA** sold crack cocaine to a CW at **PINEDA's** home at 76 Beetle Street.

24. **PINEDA** has a larceny from the person case pending in state court. According to police reports, officers arrested an individual on a warrant and, while at booking, the individual

said he wanted to file a report concerning a robbery that had taken place a few days before. The victim said that four Latin King gang members assaulted him while he was walking on Beetle Street. The victim identified one of the men as **PINEDA** and said that **PINEDA** took the man's backpack containing two laptop computers. The man admitted to New Bedford Police officers that he owed **PINEDA** \$150 for a drug debt and said he paid **PINEDA** \$20 a week to pay off the debt. The victim told officers that, once he had paid off the drug debt, he went to **PINEDA's** apartment, which he correctly identified as being on the third floor of 76 Beetle Street. When he asked for his computers back, **PINEDA** told him, "You're not getting them back. And you just got burned." In a subsequent interview, **PINEDA** denied knowing the victim or having his computers. The case is pending.

E. GABRIEL VAZQUEZ

25. Both the Bristol County Sheriff's Department and the New Bedford Police Department have identified **VAZQUEZ** as a Latin King. **VAZQUEZ** was photographed at the ENCARNACION wake with **TERRILL McKISSACK** and **JOUSEPH CARABALLO**. In 2006, **VAZQUEZ** was convicted of possession with intent to distribute cocaine and unlawful possession of a firearm and served eighteen months in prison. In 2008, **VAZQUEZ** was convicted again of possession with intent to distribute cocaine. After serving a six month prison sentence, **VAZQUEZ** was placed on probation and was on probation

for this offense when, on November 9, 2010, he sold crack to an undercover police officer.

F. EZEQUIEL QUINONES, a/k/a "Flex."

26. The New Bedford Police Department Gang Unit has identified **QUINONES** as a member of the Latin Kings. Hours after the ENCARNACION murder, **QUINONES** was photographed with dozens of other Latin King gang members at the murder scene. **QUINONES** stood with a group of other Latin Kings as they gathered together for a photograph at the murder scene. The photograph was taken by **JOUSEPH CARABALLO, a/k/a "King Massa."** Many of the Kings in the photograph (though not **QUINONES**) held their hands together to make a crown, a Latin King gang sign, and wore black and gold, colors for the Kings.

27. **QUINONES's** drug sale illustrates the degree to which the Kings control street level drug sales in the north end of New Bedford. As noted above, on May 5, 2011, the CW traveled to Tallman Street to purchase crack cocaine from **JAVIER NATAL, a/k/a "Lito."** While waiting for **NATAL**, the CW was approached by **CARABALLO**, who urged the CW to buy from him rather than wait for **NATAL** because he and **NATAL** were "brothers." After **CARABALLO** left, the CW met with **QUINONES**, who was also on Tallman Street. When the CW complained to **QUINONES** about **NATAL**, "Where is this

kid?", **QUINONES** replied, "He'll come. He'll come." After a few more minutes, the CW and **QUINONES** had the following exchange:

CW-1: This kid's blowing me off. I'm gonna cancel. I don't really know that dude right there [referring to **CARABALLO**] but he told me he's got the same stuff as Lito, but . . .

Quinones: I've got the same stuff.

CW-1: That's what I figured because you guys were working together before.

After conferring with agents by phone, the CW purchased crack cocaine from **QUINONES** inside the front hallway of 119 Tallman Street.

28. **QUINONES** has a possession with intent to distribute heroin in a school zone case pending in New Bedford District Court. He has prior convictions for possession with intent to distribute heroin and marijuana, assault with a dangerous weapon, intimidation of a witness, and violating an abuse prevention act order.

G. JAVIER NATAL, a/k/a "Lito."

29. The New Bedford Police Department's Gang Unit has identified **NATAL** as a Latin King. He has a five-point crown tattooed on his hand. As noted above, on May 5, 2011, while on Tallman Street in the heart of Latin King territory, **JOUSEPH CARABALLO** assured the CW that he and **NATAL** were "brothers" and that the CW could purchase crack from **CARABALLO** because it was the "same thing." Later that day, **EZEQUIEL QUINONES, a/k/a**

"**Flex**," another Latin King gang member, told the CW that his crack was the same as **NATAL's**. On May 19, 2011, **NATAL** sold crack cocaine to the CW at the P & D Market, located at the intersection of Tallman Street and Ashley Boulevard, just up the street from where the conversation with **CARABALLO** and the buy from **QUINONES** took place.

30. On April 27, 2010, New Bedford Police executed a search warrant at 1566 Acushnet Avenue in New Bedford. **NATAL** was present in the target apartment from which officers seized several street level bags of cocaine under a sofa. **NATAL** and others were charged with possession with intent to distribute cocaine.

31. While **NATAL** was on bail on that case, officers executed a state search warrant for WILLIAM FIGUEROA, a New Bedford Latin King, at 178 Ashley Boulevard, second floor. Once inside the building, they encountered **NATAL** and seized 20 twists of crack from him. **NATAL** was again charged with possession with intent to distribute cocaine. On September 16, 2011, **NATAL** pled guilty to both possession with intent to distribute cases. He was sentenced to 18 months in prison, 60 days to serve, balance suspended until 2013. On March 12, 2012, while on probation for these offenses, **NATAL** was again arrested by New Bedford police after officers saw him engage in a hand to hand street level drug

sale. **NATAL** pled guilty and on May 1, 2012 was sentenced to 1 year in prison.

H. LUIS GUERRA, a/k/a "Ant."

32. The New Bedford Police Department's Gang Unit has identified **GUERRA** as a Latin King. In 2011, **GUERRA** posted on his public Facebook page: "To all my brothers and sisters keep dat 5," a reference to the five points in the Kings crown. At another date, **GUERRA** posted on Facebook a picture of himself forming a crown with his hands in front of his face.

33. **GUERRA** has been convicted of three drug trafficking offenses in the past ten years. In 2002, **GUERRA** sold an undercover police officer 150 bags of heroin for \$600. Another 50 bags of heroin were seized from him at the time of his arrest. **GUERRA** was convicted of distribution of heroin and sentenced to two and a half years in prison, 18 months to serve, balance suspended for two years. In 2004, **GUERRA** was arrested in his apartment in possession of 96 grams of cocaine and charged with trafficking in cocaine. In 2005, while on bail for the earlier trafficking case, New Bedford Police officers executed a search warrant at **GUERRA's** apartment. As they approached the apartment, two bags were thrown out the window: one bag contained 10 smaller bags of crack cocaine. The other bag contained five bags, and each of the five bags contained numerous twists (22, three bags of 20, and 18) of crack cocaine. In total, officers

seized 183 bags of crack (approximately 83 grams) from inside the apartment, as well as a scale and other packaging material. On both trafficking cases, **GUERRA** received concurrent 6 year state prison sentences.

I. GIOVANNI VALE-VALENTIN, a/k/a "Gio."

34. The New Bedford Police Department Gang Unit has identified **VALE-VALENTIN** as a Latin King. Officers have observed **VALE-VALENTIN** with **EZEQUIEL QUINONES**, **PEDRO FIGUEROA**, and other Latin Kings. In 2010, **VALE-VALENTIN** and **EDWIN JORGE** were stopped by the police as they fled from the area of a shooting. A witness identified **VALE-VALENTIN** as one of two men with **JORDAN JORGE**, the shooter (**JORDAN JORGE** was acquitted at trial).

35. **VALE-VALENTIN's** drug sales in this investigation took place at or outside his home at 111 Tallman Street in New Bedford, across the street from the P & D Market (the location of the **JAVIER NATAL** crack sale and just down the street from the **JOUSEPH CARABALLO** drug conversation and **EZEQUIEL QUINONES** crack sale to the CWs). On September 21, 2011, **VALE-VALENTIN** sold a CW crack cocaine inside 111 Tallman Street. Agents on surveillance saw **VALE-VALENTIN** make a hand to hand drug sale to a customer in a car before CW-2 arrived at 111 Tallman Street.

36. **VALE-VALENTIN** has a pending distribution of cocaine in a school zone case. In that case, New Bedford Gang Unit officers

saw **VALE-VALENTIN** sell crack cocaine to a customer on the front porch of 111 Tallman Street. Officers stopped the customer with crack and arrested **VALE-VALENTIN** the next day. He has another pending case for assault and battery and malicious destruction of property. According to police reports, **VALE-VALENTIN** badly beat his ex-girlfriend. As **VALE-VALENTIN** kicked in the rear fender of the victim's car, he directed another female with him to beat the victim as well. The victim was transported to the hospital.

J. MANUEL TORRES

37. Like **VALE-VALENTIN**, **MANUEL TORRES** has been identified by the New Bedford Police Department as an up and coming member of the Latin King. During one of his drug sales to an undercover police officer, **TORRES** wore a sweatshirt marked with "RIP Ricky," a reference to the murder of RICARDO ENCARNACION. He has been observed with other Latin Kings in the Tallman Street area, including **JAVIER NATAL** and EDWIN JORGE.

38. **TORRES** lives in the same apartment as his mother, SANDRA TORRES, a Latin Queen who was charged in state court with distribution of cocaine as part of this investigation. While conducting surveillance of SANDRA and **MANUEL TORRES's** apartment, the Task Force repeatedly observed IRVIN OLIVERO, a New Bedford drug trafficker, enter and quickly exit the **TORRES's** house. Agents saw Olivero enter and quickly exit the house on two occasions a short time before a CW made a controlled buy from

SANDRA TORRES. Last week, Task Force Agents arrested OLIVERO on cocaine trafficking charges. After a short foot chase, OLIVERO discarded 101 grams of crack cocaine.

39. On October 24, 2011, **TORRES** was charged with distribution of cocaine in a school zone case. That case is pending. He also has an open domestic assault and battery and intimidation of a witness case. According to the police reports in that case, on August 4, 2011, officers responded to **TORRES's** ex-girlfriend's apartment, where after an argument **TORRES** hit her (officers saw an observable physical injury) and punched a hole in her flat-screen TV. While at the courthouse to obtain a restraining order, **TORRES** sent her a series of texts: "You sent the cops to my house, ok I got you," "Ok I'm gonna pay a bitch to go in your house and fuck you up you will see," "You snitch peace watch your back, real talk," and "They can do what they want, bye bitch." (These texts were documented by the officer in a New Bedford Police Report.) According to the report, **TORRES** also called her and told her if she did not drop the case she was going to get "clipped."

40. **TORRES** sold crack cocaine to an undercover police officer on three occasions. All three sales took place near the intersection of Tallman Street and Ashley Boulevard, the heart of Latin King territory. **TORRES** also sold to an FBI CW inside the

TORRES apartment. **SANDRA TORRES** spoke to the CW, ushered the CW to **MANUEL TORRES's** room, and **MANUEL TORRES** sold the CW crack.

K. JESUS CARRASQUILLO

41. **CARRASQUILLO** has been identified by the New Bedford Police Gang Unit as a Latin King. His New Bedford police reports reflect several Latin King tattoos, including a pitchfork and a 5 point star. The public portion of his Facebook page includes numerous references to the Latin Kings and taunts to law enforcement. The section marked "Favorite Quotes" states: *"Hey feds, heard you writing my name up I kno u want me bad think I give a fuk?"* Elsewhere, it states, *"how many mug shots are they gonna take off [sic] me to they realize they ain't gonna pin a case on me."*

L. PEDRO FIGUEROA

42. According to the New Bedford Police Department's Gang Unit, **FIGUEROA** is a Latin King. On November 5, 2011, **FIGUEROA** was arrested near the intersection of Tallman Street and Ashley Boulevard (the scene of many of the drug sales in this case and an area where the Latin Kings control street level drug sales). **FIGUEROA** was in possession of a retail quantity of heroin, \$380 in cash, and two cell phones. At the time of his arrest, **FIGUEROA** was with **ORLANDO CRUZ** and **LUIS LOPES**, a/k/a "Bebe," both of whom have been identified by the New Bedford Police Department's Gang Unit as Latin Kings. That case is still open.

On July 7, 2006, **FIGUEROA** was one of a group of men observed chasing and beating a victim on Beetle Street (in Latin King territory). According to police reports, officers pulled **FIGUEROA** off the victim, who was found lying on the ground and bleeding profusely from the forehead. When asked what had happened, the victim replied he was walking on Beetle Street when he was suddenly assaulted by three men, including **FIGUEROA**. At booking, officers noted that **FIGUEROA's** right shoe had a large quantity of blood on it. While on release for this offense, **FIGUEROA** was arrested for possession with intent to distribute cocaine. **FIGUEROA** pled guilty to assault and battery by means of a dangerous weapon and possession with intent to distribute cocaine and received concurrent sentences of two years in prison, nine months to serve, balance suspended for two years.

M. RAMON SANCHEZ

43. **SANCHEZ** has been identified as a Latin King by the New Bedford Police Department's Gang Unit. **SANCHEZ** has a distinctive tattoo on his arm of clowns and a five point crown (symbol of the Latin Kings). On the five-month anniversary of RICARDO ENCARNACION's murder, **SANCHEZ** was seen at the street memorial with Latin Kings **TERRILL McKISSACK**, **PEDRO FIGUEROA**, **JOUSEPH CARABALLO**, a/k/a "King Massa," **SINTIA NATAL** (**CARABALLO's** wife),

and ANGEL MARRERO, a Latin King who was charged in state court as a result of the FBI's 2007 FBI investigation.

44. On February 16, 2012, **SANCHEZ** pled guilty to two cases: Assault and Battery on a Police Officer and Resisting Arrest, and Possession with Intent to Distribute Marijuana and Cocaine. On these cases, he was sentenced to concurrent sentences of 18 months in prison, 3 months to serve, the balance suspended with probation for 18 months.

N. JORDAN JORGE and FELICIA TIMOTEO

45. **JORGE** has been identified as a Latin King by the New Bedford Police Department Gang Unit. **JORGE** is the brother of EDWIN JORGE, the witness in the JOSEPH ANDRADE murder trial who initially refused to testify because Latin King gang members **TERRILL McKISSACK**, TYRONE SOLANO (and other gang-involved individuals) showed up in court on the day he was expected to testify. In 2010, **JORGE** was charged with misleading investigators about his actions and the actions of his brother EDWIN JORGE before and after the ANDRADE murder. On April 20, 2012, **JORGE** was sentenced to two and a half years in prison, six months to serve, balance suspended for two years. Even with acquittals for unlawful possession of a firearm and assault and battery by means of a firearm, **JORGE** has a serious record, including convictions for possession with intent to distribute cocaine and marijuana. He was on probation for these offenses

when, on April 18, 2012, **JORGE** and his girlfriend, **FELICIA TIMOTEO**, sold crack cocaine to an FBI CW. During the drug sale, **TIMOTEO** was also on probation after she received a supervised continuation without a finding for assault and battery.

O. **ENOE CARRASQUILLO, JESMEIL ORTIZ, and MARI GOMEZ**

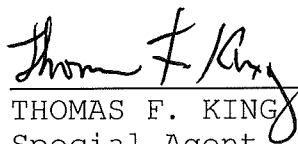
46. One of the goals of this investigation was to disrupt the drug supply to the gang. To this end, agents arrested **ENOE CARRASQUILLO, JESMIEL ORTIZ, and MARI GOMEZ** for conspiring to possess with intent to distribute cocaine for their role in bringing large quantities of cocaine to New Bedford. On May 19, 2011, agents had information from a witness that several people would be bringing 1-2 kilograms of cocaine from a flight from Puerto Rico to be delivered to the Latin Kings in New Bedford and to others in Rhode Island. Agents set up surveillance in New Bedford, where they followed a vehicle with **JESMIEL ORTIZ** and **MARI GOMEZ** traveling to Boston's Logan Airport. **ORTIZ** was observed walking into the terminal to the baggage claim area and meeting with **ENOE CARRASQUILLO**, who had just arrived on a flight from Puerto Rico. **CARRASQUILLO** collected several luggage bags and **ORTIZ** assisted **CARRASQUILLO** in loading them into the car, driven by **GOMEZ**. All three entered the car and traveled south on Route 24 toward New Bedford. Investigators provided information concerning the drug importation to a Massachusetts State Trooper,

who stopped the vehicle on Route 495 in Raynham. After a drug detecting dog alerted at the vehicle, the trooper searched it. Two kilograms of cocaine were recovered inside an amplifier inside the luggage bearing the luggage tags of JetBlue Airlines and had **CARRASQUILLO's** name on them.

IV. CONCLUSION

The Latin Kings are a violent street gang that has as a significant operating objective the protection of drug trafficking and other illegal activities by its members through violence and intimidation. Each of the Targets in this case is a member of the gang or a significant criminal associate of the gang. The Targets have also demonstrated that they are drug traffickers who share the basic objectives of the gang. Each should be detained pending trial.

Signed under the pains and penalties of perjury this 7th day of June, 2012.


THOMAS F. KING

Special Agent
Federal Bureau of Investigation

EXHIBIT 1

AFFIDAVIT OF SPECIAL AGENT J. MICHAEL DOYLE IN
SUPPORT OF PRE-TRIAL DETENTION

I, J. Michael Doyle, being duly sworn, state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for approximately 12 years. For the last year I have been assigned to the FBI Southeastern Massachusetts Gang Task Force (SEMGTF). Prior to that I was assigned to the FBI Violent Crimes Task Force in New York City where I investigated crimes of violence including gang-related investigations. I have been the lead agent on a multi-agency investigation targeting the leadership and other significant members of the chapter of the Latin Kings operating in New Bedford, Massachusetts. Since this investigation was initiated in early 2006, law enforcement agents have successfully made purchases of cocaine base from leaders, members and associates of the Latin Kings. Almost all of these purchases were made in New Bedford by cooperating witnesses ("CWs") who wore recording equipment and agreed to have their meetings and conversations with the Targets recorded. The investigation resulted in the indictment of 15 defendants on federal drug charges and an additional 22 defendants on state drug charges.

2. This affidavit is not intended to set forth all of the information that I and other law enforcement personnel have

learned during this investigation, but is submitted only in support of the pre-trial detention of the above-captioned defendants.

3. One of SEMGTF's primary goals is to reduce firearm violence in Southeastern Massachusetts by targeting, investigating, and prosecuting violent street gangs. Based on our discussions with local law enforcement and particularly officers of the New Bedford Police Department and the Bristol County Sheriff's Office, we determined that the New Bedford chapter of the Latin Kings was a significant street gang responsible for a disproportionate share of the drug trafficking and firearm violence in New Bedford. Several officers informed me that the Latin Kings were well-organized and controlled the drug trade in a significant area of New Bedford centered around the North End area of New Bedford and including North Front, Tallman, Deane, Bullard, and Nye Streets. Task Force members employed by the New Bedford Police Department have advised me orally and in writing that they have been involved in hundreds of arrests, interviews, and encounters with Latin King members in this area and been made aware that if persons not affiliated with the Latin Kings try to sell drugs in the area they risk being beaten, stabbed, or shot.

4. For example, in a New Bedford police report dated June 17, 2006, attached as Exhibit 1, a detective stated that the Latin Kings are a "street gang known for its propensity for violence and drug related activity. The Latin Kings have plagued the North Front Street area with drugs and violence." Exhibit 1 at p. 7. Later in the report, a sergeant described how dealers used the connected yards behind 325 North Front Street and 51 Tallman to conduct their drug transactions. "We have become very familiar with the drug dealers that deal from this area since we have been arresting them over and over during the last year. Nevertheless they return to the area and continue dealing drugs. . . we are constantly getting complaints from the nearby residents who are living in this area and have to view this drug dealing on a constant basis. We are constantly hearing from parents that they are not able to allow their children to play in the backyards due to the around the clock traffic of these drug users and drug dealers."

5. During the course of this investigation, the SEMGTF utilized CWs to make controlled purchases of crack cocaine from the targets largely because the targets would sell drugs only to people they knew and trusted. In frequent interviews, the CWs also consistently informed us that the Latin Kings not only sold

crack and other drugs in and around these streets, but that they completely controlled the drug trade in the area.

6. The majority of the drug deals charged in the above-captioned indictments occurred in this area. The chart attached as Exhibit 2 shows the date of each distribution, the quantity and price of the crack cocaine sold, the defendants involved, and the location of the sale. The map attached as Exhibit 3 shows the location of the sales within the area. As these exhibits demonstrate, of the 25 charged crack sales, only 8 did not occur in the area. The deals were conducted both inside and outside, often with one or more members of the Latin Kings present in the same room or area.

7. Three CWs were used in the 25 drug sales charged in the above-captioned cases. Each has been interviewed about its knowledge of the defendants and their association with the Latin Kings. In addition, members of SEMGTF have interviewed several confidential informants (CIs) including one or more who are members of the Latin Kings. In addition, I have reviewed the records of the Bristol County House of Corrections, who keep records of gang affiliation. Finally, I have spoken with officers of the Bristol County Sheriff's Office and the New Bedford Police Department who have extensive experience with the Latin Kings. Based on the information set forth above, I can

state that each of the defendants listed below is a member or an associate of the Latin Kings:

Javier Ortiz Perez, aka King Javier;
Felipe Ortiz Perez, aka King Felipe;
Ricardo Negron Cabrera, aka King Cano;
Juan Nova Roman, aka King Roman;
Diego Perez, aka King Loco;
Jorge Torres, aka King Jorge;
Luis Sostre, aka Louie;
Javier Reyes, aka King Hollywood;
Gustavo Feliciano, aka King Gustavo;
Guillermo Lugo, aka King Gilly;
Abraham Perez, aka King Diamond;
Rafael Reyes, aka King Coffee;
Juan Serrano, aka King Poppy;
Kimberly Steadman, aka Queen Keisha;
Rakeem Waller, aka King Taz.

In addition, at least three of the defendants have or had leadership positions within the Latin Kings New Bedford Chapter: Diego Perez (leader), Javier Ortiz-Perez (high ranking member), Luis Sostre (high ranking member). Even those defendants who are associates of the Latin Kings have important relationships with the gang. For example, a CI who is a member of the Latin Kings stated to us that the Latin Kings previously had a violent dispute with Rakeem Waller as a result of his attempts to sell drugs in the area and that the dispute ended only in the last year when Waller and leaders of the Latin Kings made a pact to co-exist.

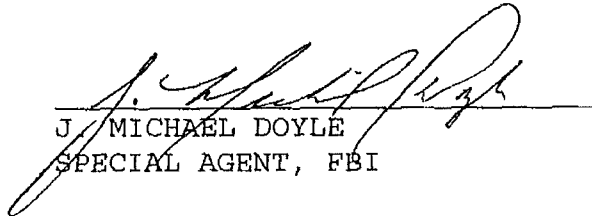
8. Although this investigation has initially focused on the local activities of the New Bedford chapter of the Latin Kings, I

know from my training and experience that the Latin Kings are a national gang that was founded in the 1960s in Chicago and now has chapters in states and cities throughout the Eastern United States. Regional Chapters must be sanctioned by the national leadership in Chicago. Each Regional Chapter must then sanction its local chapters. The stated purpose of the Latin Kings was the organization of Hispanics dedicated to overcoming an "oppressive government" and uplifting all "third world" people. In reality they primarily operate as a violent gang in prisons and in cities, where they typically engage in drug trafficking to enhance their financial strength. Indeed, the Latin Kings operate chapters in several other Massachusetts cities and their drug and violent activities have resulted in federal prosecutions in Lawrence and Lowell in 2004, in greater Springfield in 2005, and in Chelsea in 2006. The Affidavit of FBI Special Agent Jeffrey S. Wood, attached here as Exhibit 4, explains the history of the Latin Kings in Massachusetts in greater detail.

9. The defendants' affiliation with the Latin Kings heightens the danger they present to the community, both because the affiliation makes it more likely that the defendants will be able to continue to engage in drug trafficking despite their arrests and because of the possibility that members of the Latin

Kings as a group will try to threaten or assault people who have or are believed to have cooperated with the government in the investigation.

Signed under the pains and penalties of perjury this 14th day of May, 2007.


J. MICHAEL DOYLE
SPECIAL AGENT, FBI

TABLE

Date	Wt./ Price	Defendant	Location
05-04-06	1.3/ \$100	Abraham Perez King Diamond	11 Nye Street
05-04-06	1.6/ \$100	Abraham Perez King Diamond	11 Nye Street
05-04-06	2.0/ \$150	Abraham Perez King Diamond	11 Nye Street
05-05-06	3.3/ \$300	Kimberly Steadman Queen Keisha	868 County Street
05-05-06	3.4/ \$300	Juan Serrano King Poppy	11 Nye Street
05-05-06	1.7/ \$150	Kimberly Steadman Queen Keisha	868 County Street
05-08-06	6.7/ \$300	Gustavo Feliciano King Gustavo	307 North Front Street/ 361 Coggeshall Street
05-09-06	26.6/ \$900	Rafael Reyes King Coffee	171 Ashley Boulevard
05-09-06	2.5/ \$300	Jorge Torres King Jorge	11 Nye Street
05-12-06	2.7/ \$300	Rakeem Waller King Taz	40 Bullard Street
05-15-06	3.2/ \$150	Jorge Torres King Jorge	11 Nye Street
05-15-06	1.0/ \$100	Rakeem Waller King Taz	40 Bullard Street
05-22-06	3.0/ \$150	Guillermo Lugo King Gilly	280 Acushnet Avenue
05-30-06	3.2/ \$150	Guillermo Lugo King Gilly	280 Acushnet Avenue
06-09-06	2.4/ \$200	Rakeem Waller King Taz	40 Bullard Street
06-21-06	6.8/ \$300	Javier Reyes King Hollywood	Tallman/North Front Street

08-03-06	5.4/ \$300	Javier Ortiz Perez King Javier Felipe Ortiz Perez	289 Hillman Street
08-16-06	6.5/ \$300	Ricardo Cabrera King Cano (Luis Robles)	289 Hillman Street
08-23-06	4.8/ \$300	Javier Ortiz Perez King Javier Juan Nova Roman	289 Hillman Street
02-15-07	0.74/ \$120	Juan Serrano King Poppy	82 Deane Street
03-02-07	2.9/ \$200	Juan Serrano King Poppy	27 Bullard Street
04-09-07	*/ \$300	Diego Perez King Loco	27 Bullard Street
04-13-07	*/ \$100	Diego Perez King Loco	27 Bullard Street
04-24-07	*/ \$100	Luis Sostre	83 Deane Street
04-26-07	*/ \$160	Diego Perez King Loco	27 Bullard Street

* exhibit confirmed to be crack cocaine, but weight not yet received from lab



Address 11 Nye St
New Bedford, MA 02746

